

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Ertan Erden	:	Chapter 13
	:	Case No.: 20-12746-ELF
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, Ertan Erden, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on June 23, 2020.
2. The Chapter 13 Plan was confirmed on December 1, 2020.
3. On June 27, 2022, Creditor, American Heritage Credit Union, who services the debtor's vehicle loan, filed a Motion for Relief from the Automatic Stay.
4. American Heritage Credit Union agreed to a Stipulation of Settlement permitting the debtor to include post-petition arrears into a Modified Chapter 13 Plan. See Exhibit "A."
5. Debtor has paid \$34,051.67 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$1,475.00 per month for the remaining 36 months for a new base amount of \$81,151.67.
7. An Amended Schedule J was filed on July 20, 2022 to demonstrate the feasibility of the Modified Plan.

8. The debtor is aware they must remain current on all ongoing post-petition payments owed to American Heritage Credit Union in order to avoid any future modifications to the Automatic Stay.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of American Heritage Credit Union.

Dated: July 25, 2022

/s/Brad J. Sadek, Esq.
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